



SEQUOIA
ENGINEERING &
DESIGN
ASSOCIATES

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FILED

OCT 16 2020

UNITED STATES BANKRUPTCY COURT
SAN FRANCISCO, CA

October 14, 2020

Bankruptcy Case No. 19-30088
(DM), Claim #s 73323 & 75013 –
Response to 14th & 15th Omnibus
Objections by Reorganized Debtors

Keller Benvenuti Kim LLP
650 California St., Ste. #1900
San Francisco, CA 94108

Gentlemen,

We hereby present our opposition to the reduction of our claims (attached) in the Debtor's 14th and 15th Omnibus Objections to Claims since it is not presenting which amounts are being objected to in the subject claims we filed, and which we were paid for. The objections list the full amounts paid, excluding interest (attached).

Attaching the original A/R report which lists all the original invoices and the balance due before the claims were paid, along with a spreadsheet which shows which invoices were paid in full or partially subsequent to our claim. The Original claim of \$161,799.43 closely matches the amount of \$162,230.38 paid by Evolve bank. Indeed, since we submitted the claims, a couple of invoices were paid by PG&E, as shown on the attached spreadsheet, but there was no mechanism to adjust the claim amount after it had been submitted. However, we thought that the discrepancy between the amounts was the interest due on our invoices which the bankruptcy judge levied; we couldn't find any reference to the interest rate used to calculate that amount.

We attempted a couple of times to handle our objection on line, by logging into 'Restructuring.Primeclerk.com/PGE/Case Navigation/Claims' but to no avail, the search of our cases came up blank.

Finally, I left a voicemail with your firm this afternoon. Please do not hesitate to contact us at the above phone number should you be able to offer further clarifications, before we follow up and file our objection by mail with the Court.

Very truly yours,

Eli Yagor

Eli Yagor, P.E.
Principal

Creditor Name: ELI YAGOR, SEQUOIA ENG & DESIGN ASSOCIATES

Claim To Be Reduced or Disallowed	Debtor		Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
73323	PG&E Corporation	Filed Claim Amount:	\$0.00	\$0.00	\$0.00	\$93,453.23	\$93,453.23	Books and Records
		Reduced Claim Amount:	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	

On September 17, 2020, PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively, the “Debtors,” or as reorganized pursuant to the Plan, the “Reorganized Debtors”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), filed their *Fourteenth Omnibus Objection to Claims (Books and Records Claims)* (the “Omnibus Objection”) with the United States Bankruptcy Court for the Northern District of California (San Francisco Division) (the “Bankruptcy Court”). A full copy of the Omnibus Objection may be obtained at no cost, as provided below.

Any Response (as defined below) to the Omnibus Objection must be filed and served upon the Reorganized Debtors’ Counsel by October 14, 2020 (the “Response Deadline”);

Any Response must be accompanied by any declarations or memoranda of law any responding party wishes to present in support of its position;

If there is no timely Response, the Bankruptcy Court may enter an order granting the Omnibus Objection to your Proof(s) of Claim by default.

If you file a timely Response, the Hearing will be held at the date and time shown below. If factual disputes are presented by the Objection and the Response, the Hearing will proceed as a status conference; factual disputes will not be decided at the Hearing, but at a future evidentiary hearing that may be set at the Hearing. Issues of a purely legal nature, where facts are not in dispute, may be decided at the Hearing. See Bankruptcy Local Rule 3007-1.

If you file and serve a timely Response, the date, location and time of the Hearing are:

October 28, 2020 at 10:00 a.m. (Pacific Time)

Courtroom 17, 16th Floor, 450 Golden Gate Ave., San Francisco, CA

The Hearing will be held before the Honorable Dennis Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court’s *Amended General Order No. 38 In re: Coronavirus Disease Public Health Emergency*, dated March 30, 2020, all hearings through September 30, 2020 will be held by video or teleconference. Parties are advised to visit the Bankruptcy Court’s website, at www.canb.uscourts.gov, prior to the hearing date to determine whether the Omnibus Hearing will be conducted telephonically and the courtroom will be closed. If so, all parties who wish to appear at the Hearing should refer to the Bankruptcy Court’s website, www.canb.uscourts.gov > Rules and Procedures > District Procedures > Policy and Procedure for Appearances by Telephone, for current information about how to appear. Reorganized Debtors’ Counsel will, as a courtesy and on request, provide by email to those who have filed timely Responses updated information regarding how to attend.

Creditor Name: Eli Yagor, dba Sequoia Engineering & Design Associates

Objected-To Claim(s)							Basis for Objection
Debtor	Date Filed / Scheduled	Secured	Admin	Priority	General Unsecured	Total Amount	
PG&E Corporation (CLAIM 75013)	10/17/2019	\$0.00	\$47,357.17	\$0.00	\$0.00	\$47,357.17	Cure Payments

On September 17, 2020, PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively, the “Debtors,” or as reorganized pursuant to the Plan, the “Reorganized Debtors”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), filed their *Fifteenth Omnibus Objection to Claims (Satisfied Claims)* (the “Omnibus Objection”) with the United States Bankruptcy Court for the Northern District of California (San Francisco Division) (the “Bankruptcy Court”). A full copy of the Omnibus Objection may be obtained at no cost, as provided below.

Any Response (as defined below) to the Omnibus Objection must be filed and served upon the Reorganized Debtors’ Counsel by October 14, 2020 (the “Response Deadline”);

Any Response must be accompanied by any declarations or memoranda of law any responding party wishes to present in support of its position;

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Sequoia Engineering & Design Associates
PG&E - Open Invoices
As of October 8, 2019

Updated A/R for PG&E

Invoice#	Amount Invoiced	Balance Due	Billing Dates	Project	Sub's billing
5021	\$ 11,933.29	\$ 11,933.29	12/01 - 12/31/18	S701, Delevan CEMS	Buckles-Smith, Inv# 3121734, 11/20/18
5022	\$ 22,430.01	\$ 22,430.01	12/01 - 12/31/18	S506, Kettleman	N/A
5023	\$ 1,843.92	\$ 1,843.92	12/01 - 12/31/18	S732, McDonald Island	N/A
5024	\$ 16,657.70	\$ 16,657.70	12/01 - 12/31/18	S338, Delevan DDAC	Connexsys, Inv# 33850, (12/01-12/15/18) Connexsys, Inv# 33865, (12/16-12/31/18)
5025-R	\$ 23,089.18	\$ 23,089.18	11/01 - 12/31/18	S701, Delevan CEMS	WME, Inv# 41737, (11/01-12/31/18)
"	"	"	1/01-1/08 & 1/29-1/31/19	"	N/A
5025-A	\$ 3,788.82	\$ 3,788.82	01/09 - 01/28/19	"	N/A
5045-R	\$ 14,149.35	\$ 14,149.35	02/01 - 02/28/19	S701, Delevan CEMS	N/A
5027-A	\$ 647.59	\$ 647.59	01/09 - 01/28/19	S732, McDonald Island	N/A
5026-A	\$ 12,684.06	\$ 12,684.06	(01/09 - 01/28)	S338, Delevan DDAC	Connexsys, Inv# 33886, (01/09 - 01/28)
** 5050-1	\$ 4,009.50	\$ 3,358.93	01/25 - 01/31/19	S338, Delevan DDAC	Connexsys, Inv# 33886, (01/01-01/08 & 01/29-01/31)
5028-A	\$ 30,438.20	\$ 30,438.20	01/09 - 01/28/19	S506, Kettleman	WME Inv# 41820, (01/14 - 01/16)
5046-1	\$ 15,896.31	\$ 8,918.16	1/01-1/08 & 1/29-1/31/19	S506, Kettleman	"
"	"	"	12/01 - 12/31/18	"	WME Inv# 41738, (12/01 - 01/31/18)
** 5076-A	\$ 4,231.50	\$ 4,030.00	01/14 - 01/16/19	S506, Kettleman	WME, Inv# 42156, (01/14-01/16) (SPLIT- \$4,030x 1.05)
		\$ 161,799.43			
		\$ 153,969.21			
		\$ 161,799.43			
		\$ 153,969.21			

** = Invoices partially paid by PG&E

inv#	name	date	amt billed	amt pd	date pd	ck#	notes	open bal
5021	S-701 Delevan K3 CEMS PLC Upgrade	01/10/19	\$11,933.29					11,933.29
5022	S-506 Kettleman CS Replace Unit Control System	01/10/19	\$22,430.01					22,430.01
5023	S-732 McDonald Island MCS, Upgrade Motor Purge Air System	01/10/19	\$1,843.92					1,843.92
5024	S-338, Delevan K3, Install DDAC VFD Starter	01/10/19	\$16,657.70					16,657.70
5025	S-701 Delevan K3 CEMS PLC Upgrade	01/25/19	\$26,878.00					26,878.00
5026	S-338, Delevan K3, Install DDAC VFD Starter	01/25/19	\$12,684.06					12,684.06
5027	S-732 McDonald Island MCS, Upgrade Motor Purge Air System	01/25/19	\$647.59					647.59
5028	S-506 Kettleman CS Replace Unit Control System	01/25/19	\$30,438.20					30,438.20
5029	S-701 Delevan K3 CEMS PLC Upgrade (01/25-01/31/19)	03/08/19	\$1,309.35	\$1,309.35	29-Apr-19	4588245		0.00
5045-R	S-701 Delevan K3 CEMS PLC Upgrade (02/01-02/28/19)	03/08/19	\$14,149.35	\$13,937.12	18-Feb-20	4702524	Payment Received	0.00
5046-R	DISCOUNT TAKEN (2/18/20)	18-Feb-20		-\$212.24		resubmitted inv5045-R on Taulia		0.00
5046	S-506 Kettleman CS Replace Unit Control System (01/25-01/31/19)	03/08/19	\$15,896.31	\$6,978.15	29-Apr-19	4588245		8,918.16
5050	S-338, Delevan K3, Install DDAC VFD Starter	03/08/19	\$4,009.50	\$650.57	29-Apr-19	4588245	partial pymt	2,329.08
5050	Partial payment (02/13/20)			\$1,029.85	13-Feb-20	4699959	partial pymt	
5050							Short pd \$4,030 for	
5050	S-506 Kettleman CS Replace Unit Control System	04/15/19	\$88,924.04	\$64,894.04	12-Jun-19	4588425	WME (01/01-01/15)	4,030.00

\$138,790.01

\$14,149.35 inv#5045
\$1,029.85 inv#5050 partial
\$15,179.20

-\$153,969.21
-\$15,179.20

pd \$13,937.12, (2/18/20)

**

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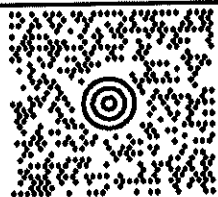
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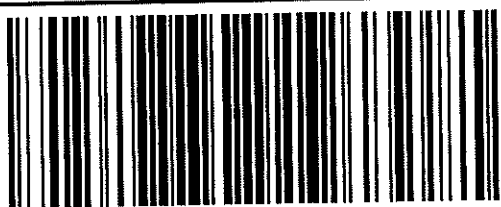
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Page 6 of